

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2016 MAY 17 PM 3:56

DEPUTY CLERK

NT

UNITED STATES OF AMERICA

v.

Case No. 3:15-CR-432-M

PATRICIA TORRES (37)
a/k/a Martha

FACTUAL RESUME

In support of the defendant's plea of guilty to the offense in Count One of the Superseding Indictment, charging a violation of 21 U.S.C. § 846, Patricia Torres and her attorney, Roger Haynes, and the United States of America (the government) stipulate and agree to the following:

I. ELEMENTS OF THE OFFENSE

In order to establish the guilt of the defendant for the offense of Conspiracy to Distribute 50 grams or more of Methamphetamine, in violation of 21 U.S.C. § 846 as alleged in Count One of the Superseding Indictment, the government must prove each of the following elements beyond a reasonable doubt:

1. That two or more persons, directly or indirectly, reached an agreement to possess with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;
2. That the defendant knew of the unlawful purpose of the agreement;
3. That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose;

4. That the overall scope of the conspiracy involved 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine; and,
5. That the defendant knew or reasonably should have known that the scope of the conspiracy involved at least 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine.

II. STIPULATED FACTS

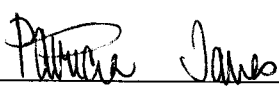
Patricia Torres admits and acknowledges that beginning in or about September-October 2014, and continuing thereafter, in the Dallas Division of the Northern District of Texas, and elsewhere, that she and other persons both known and unknown, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together, with each other and with other persons both known and unknown, to commit certain offenses against the United States, to wit: to possess with the intent to distribute and to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 846.

During the course of the investigation, law enforcement intercepted numerous communications between Rafael Gonzalez-Lucatero, Patricia Torres, and others who were distributing methamphetamine. An example of Torres's actions in furtherance of this conspiracy follow. Agents intercepted numerous communications between Torres and Gonzalez-Lucatero, her contact in Dallas, regarding a methamphetamine delivery from Gonzalez-Lucatero and others to couriers from Kansas City, MO, Corrie Dudley^{PL} and ^{Luis Martinez} ~~Joshua Leon~~ Torres requested Dudley and Leon travel to Dallas to deliver drug


proceeds and obtain methamphetamine. Dudley and Leon drove to Dallas and eventually arrived at an auto-repair shop where they paid Gonzalez-Lucatero \$15,000 of drug proceeds in United States currency. Gonzalez-Lucatero and others then transferred the methamphetamine to Dudley and Leon. Shortly after leaving the shop, while driving back to Kansas City, law enforcement stopped Dudley and Leon and recovered 5,865 grams of methamphetamine (of which, 5,818 grams was actual). ^{pl.} The investigation ~~revealed the drugs seized were imported into the United States from Mexico.~~

Torres agrees that the conspiracy involved 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine and that she committed each of the essential elements of the drug conspiracy as set out in this factual resume. This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement of facts is to demonstrate that a factual basis exists to support Torres's guilty plea to Count One as set forth in the Superseding Indictment.


AGREED AND STIPULATED on this 4th day of MAY, 2016.




Patricia Torres
Defendant



Roger Haynes
Attorney for Defendant



John Kull
Assistant United States Attorney



Rick Calvert
Deputy Criminal Chief